

Gustavo Ponce, Esq.  
Nevada Bar No. 15084  
Mona Amini, Esq.  
Nevada Bar No. 15381  
**KAZEROUNI LAW GROUP, APC**  
6787 W. Tropicana Ave., Suite 250  
Las Vegas, Nevada 89103  
Telephone: (800) 400-6808  
Facsimile: (800) 520-5523  
E-mail: gustavo@kazlg.com  
E-mail: mona@kazlg.com

*Attorneys for Plaintiff,*  
JENNAFER AYCOCK

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JENNAFER AYCOCK,

Plaintiff,

vs.

AMERICAN EXPRESS NATIONAL  
BANK AND EXPERIAN  
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No.: 2:23-cv-00292-CDS-EJY

**JOINT STIPULATION AND  
ORDER EXTENDING  
DISCOVERY DEADLINES**

**(FIRST REQUEST)**

Plaintiff Jennafer Aycock (“Plaintiff”), and Defendant American Express National Bank (“American Express”) (“the Parties”) hereby jointly<sup>1</sup> move to extend all deadlines set forth in the Joint Proposed Discovery Plan and Scheduling Order filed with this Court on May 12, 2023, (ECF No. 14) by a period of one hundred and fifty (150) days due to the complexity and unique set of facts in this matter.

<sup>1</sup> Defendant Experian Information Solutions, Inc. does not join in this motion because it has settled its claims with Plaintiff.

1 This matter contains unique and complex facts and issues in light of the claim  
2 of extensive identity theft that Plaintiff alleges was committed by her ex-boyfriend  
3 Brandon Sattler. Specifically, Plaintiff alleges that Mr. Sattler fraudulently opened  
4 multiple credit card accounts in her name with various lending institutions. This is  
5 not an ordinary identity theft or fair credit reporting case but a much more extensive  
6 one which the Parties anticipate will require the review of hundreds of additional  
7 documents and recordings as well as depositions of multiple third-party witnesses.

8 Plaintiff served American Express with a request for production of documents  
9 on June 27, 2023, and once the responses came back on August 3, 2023 from  
10 American Express, it became apparent that the Parties would need more time to flush  
11 out the issues and facts related to Plaintiff's allegations that were not previously  
12 known by the Parties. Due to the nature of the facts here the Parties in good faith  
13 believe more time is necessary to conduct efficient discovery and for the Parties to  
14 have effective conversations.

15 1. On February 24, 2023, Plaintiff filed her Complaint (ECF No. 1), against  
16 Defendants American Express and Experian.

17 2. American Express filed its Answer to Plaintiff's Complaint on June 26,  
18 2023 (ECF No. 20).

19 3. The Parties have completed the following discovery to date:

- 20 • The Parties have exchanged initial disclosures.
- 21 • Plaintiff served America Express with a request for production of
- 22 documents on June 27, 2023.
- 23 • Plaintiff served America Express with a request for admissions and
- 24 interrogatories on August 11, 2023.

25 4. The parties still need to conduct depositions, potentially additional  
26 written discovery, serve subpoenas, conduct third-party depositions, and conduct  
27 expert discovery.  
28

5. The additional time will allow the Parties to conduct extensive and additional fact discovery, including taking depositions, potentially additional written discovery, acquiring all documents from third-parties, resolving any discovery issues, and additional time to adequately determine whether expert discovery will be needed in this matter.

6. No party will be prejudiced by this Court granting this Stipulation as all Parties jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the extension will serve the ends of judicial economy.

7. Moreover, the requested extensions are not sought for the purposes of delay.

8. This is the Parties' first request to extend these deadlines.

9. Accordingly, the parties request adoption of the following deadlines:

**a. Discovery Plan:**

Discovery Cut-off **03/11/2024**

Deadline to Disclose Expert Disclosures **12/27/2023**

Deadline to Disclose Rebuttal Expert Disclosures **01/29/2023**

Deadline to File Dispositive Motions **04/08/2024**

**b. Pre-Trial Order:** The parties shall file a joint pretrial order no later than ~~04/26/2024~~ **May 8, 2024** or thirty (30) days after the date set for filing dispositive motions. In the event that Parties file dispositive motions, the date for filing the joint pretrial order shall be suspended until thirty (30) days after decision on the dispositive motion or further order of the Court.

///

///

///

WHEREFORE, Plaintiff and American Express respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

Dated this 28th day of August 2023.

**KAZEROUNI LAW GROUP, APC**

/s/ Gustavo Ponce

Gustavo Ponce  
Nevada Bar No. 15084  
Mona Amini  
Nevada Bar No. 15381  
6787 W. Tropicana Avenue, Suite  
250  
Las Vegas, NV 89103

***Counsel for Plaintiff Jennafer  
Aycock***

**KAEMPFER CROWELL**

/s/ Sihomara Graves

Robert McCoy  
Nevada Bar No. 9121  
Sihomara L. Graves, No. 13239  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, NV 89135

Nami Kang (*pro hac vice forthcoming*)  
Stephen J. Newman (*pro hac vice  
forthcoming*)

STEPTOE & JOHNSON LLP  
2029 Century Park East, 18th Floor  
Los Angeles, CA 90067

***Counsel for American Express  
National Bank***

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: August 28, 2023